

(Post 11/2015)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
Central DIVISION

FILED
U. S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

FEB 12 2021

JAMES W. McCORMACK, CLERK
By: [Signature] DEP CLERK

Gregory W Poole

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. 4:21-cv-117-KGB
(case number to be supplied by the assignment clerk)

Envoy Airlines

This case assigned to District Judge Baker
and to Magistrate Judge Volpe

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Gregory W Poole, is a
(name of plaintiff)
citizen of the United States and resides at 1241 Norris Rd,
(street address)
Memphis, Shelby, TN, 38106,
(city) (county) (state) (ZIP)
901-462-1570.
(telephone)

3. Defendant, Envoy Airlines, lives at, or its
(name of defendant)
business is located at 2400 David Grumdest Bldg 200,
(street address) Little rock,
(city)
Pulaski, Arkansas, 72206.
(county) (state) (ZIP)

4. Plaintiff sought employment from the defendant or was employed by the

as follows: Discriminated against due to my race
(Black) in violation of the Civil Rights Act,
Racial harassment and bullying on the job.

10. The acts set forth in paragraph 9 of this complaint:

- (a) _____ are still being committed by defendant.
- (b) _____ are no longer being committed by defendant.
- (c) ☒ _____ may still be being committed by defendant.

11. Plaintiff attaches to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission which charges are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) _____ Defendant be directed to employ plaintiff, and
- (b) _____ Defendant be directed to re-employ plaintiff, and
- (c) _____ Defendant be directed to promote plaintiff, and
- (d) ☒ _____ Defendant be directed to Monetary + Benefits

and that the Court grant such relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.


SIGNATURE OF PLAINTIFF

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Gregory Poole**
1241 Norris Road
Memphis, TN 38106

From: **Memphis District Office**
1407 Union Avenue
Suite 900
Memphis, TN 38104

☐

On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

490-2020-02872

JOSHUA J. COLLINS,
Investigator Support Asst

(901) 544-0070

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

☐

The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.

☐

Your allegations did not involve a disability as defined by the Americans With Disabilities Act.

☐

The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.

☐

Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge

☒

The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.

☐

The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.

☐

Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed **WITHIN 90 DAYS** of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred **more than 2 years (3 years)** before you file suit may not be collectible.

On behalf of the Commission



November 25, 2020

Enclosures(s)

Delner Franklin-Thomas,
District Director

(Date Mailed)

cc:

Chanen J. Lively
Human Resources Director
ENVOY AIR INC
4301 Regent Blvd.
Md 243
Irving, TX 75063